

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

UNITED STATES DISTRICT COURT

DISTRICT OF NEW MEXICO

AUG 10 2015

MIGUEL LUJAN.

PLAINTIFF,

VS.

CITY OF ESPANOLA, ESPANOLA POLICE DEPARTMENT, OFFICER LUGINBUHI, and OFFICER MARTINEZ,
JUDGE: KIRTAN KHALSA
DEFENDANTS,

MATTHEW J. DYKMAN
CLEAR

CIVIL ACTION NO: 15-CV-93 SCV/KK

MOTION FOR THE APPOINTMENT OF COUNSEL

I request that the court appoint an attorney to represent me in the matter cited above.

In support of the motion, I state the following:

- (1.) On July 31, 2015, I received a copy of the defendants "ANSWER" to my Complaint; in the above cause number.
- (2.) The defendant primarily asks the court to dismiss my Complaint.
- (3.) I am pleading with the court for not to dismiss the Complaint for the following reasons: (a) The Espanola Police beat me so many times that my brain and my heart is damaged.
- (b) I have suffered serious medical problems (c.) They violated my 8th Amendment rights to cruel and unusual punishment.
- (4.) I don't know how to represent myself on this case. There is no one here, at this facility to help me fight my case.
- (5.) I have made the following efforts to obtain counsel from several legal services, organizations or individual attorneys without payment of a fee or on a contingent fee basis, and have been unable to obtain the services of counsel.

(1.)

Philip B. DAVIS Attorney at Law, Lucero and Howard, LLC,
August Jonas Rane Attorney at Law, Nicholas T. DAVIS LAW OFFICE
of Philip B. DAVIS, ACLU, Rothstein, Donatelli, Hughes,
Dahlstrom, Schenckburg and BIENVENU, LLP, LAW OFFICE OF
FRANCES CROCKETT, LLC. I wrote all these lawyers.

(i.) Nobody wants to help me in this case.

I humbly ask this Court and pray that this
"MOTION FOR THE APPOINTMENT OF COUNSEL", be
granted.

DECLARATION UNDER PENALTY OF PERJURY

The undersigned declares under penalty of perjury that he
is the plaintiff in the above action that he has read the
above complaint and that the information contained
therein is true and correct 28 U.S.C. Sec 1746 18 U.S.C.
Sec. 1621.

Executed at: GACF
(location)

on 8-6-15
(DATE)

x Miguel Lujan
(signature)

CERTIFICATE OF SERVICE

I hereby certify that on the. 8-6-15 . I sent
the MOTION for APPOINTMENT of COUNSEL and mailed a
Copy by U.S. MAIL, to:

MARK A. BASHAM
BASHAM and BASHAM, P.C.

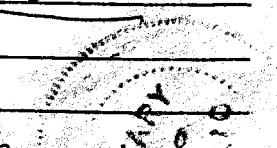
2205 Miguel Chavez Road, Suite A
Santa Fe, New Mexico 87505

x Miguel Lujan
MIGUEL LUJAN
DOC # 66946.

(2.)

SUBSCRIBED AND SWEARN TO BEFORE ME
THIS. 6 day of August , 2015. By
Miguel Lujan
MIGUEL LUJAN DOC#66946, Pro-Se.

* NOTARY PUBLIC *Michael Faibisoff*

* MY COMMISSION EXPIRES Nov 30 2016 

(3.)

Guadalupe County Correctional Facility
Name: Mattie J. Dykman NMCD# Unit 7
Post Office Box 520
Santa Rosa, New Mexico 88435



RECEIVED
United States District Court
District of New Mexico
Office of the Clerk
MATTHEW J. DYKMAN
CLERK

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